

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

MICHAEL HACKLEY ARCHITECTS,

P.C. and MICHAEL HACKLEY,

Plaintiffs,

v.

LVLX, INC., JOHN LEE,

COMMERCIAL FINISH GROUP, INC.,

JEFFREY WAY, AND JOHN TROUTON,

Defendants.

Case No.:

JFM 02 CV 3363

Deposition of ROBERT MICHAEL HACKLEY

Baltimore, Maryland

Monday, June 16, 2003

10:05 a.m.

Job No.: 1-18010

Pages 1 - 211, Volume I

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OF ROBERT MICHAEL HACKLEY
ON MONDAY, JUNE 16, 2003

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1 A I had no conversation with John Lee
2 about the summary of these invoices.

3 Q Did you have any conversations did you have with
4 anybody in his office about the summary of
5 invoices?

6 A I had no conversations with anybody in
7 his office about the summary of these invoices.

8 Q Is it a long-distance call between you
9 and Mr. Lee or LVJX from your office?

10 A I don't remember for sure, but I would
11 say I don't think so.

12 MR. JOHNS: Mark this 37.

13 (Deposition Exhibit 37 was marked for
14 identification and was retained by counsel)

15 BY MR. JOHNS:

16 Q Handing you what has been marked as
17 Exhibit 37. That's your letter; isn't it?

18 A Yes, it looks like my letter of
19 June 7th.

20 Q And it is concerning outstanding
21 invoices; right?

22 A Yes.

DEPOSITION OF ROBERT MICHAEL HACKLEY
CONDUCTED ON MONDAY, JUNE 16, 2003

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1 Q And nowhere in that letter does it say
2 that PGP2 or the plans for that is an outstanding
3 invoice; isn't that correct? Yes or no?

4 A In a way, it does, because the balance
5 due is \$14,283.09, and the amount that is owed to
6 us is in there.

7 Q Well -- but the rendering -- it says
8 that the rendering for \$8,000 is outstanding;
9 doesn't it?

10 A No.

11 Q Well, it says here outstanding invoices
12 under RE, and it says here "Electronic 3D drawings,
13 we have 64 hours of professional time that we spent
14 on your behalf for the electronic drawings and new
15 design concept that you requested we do for you."

16 (Brief discussion off the record)

17 BY MR. JOHNS:

18 Q It says, "it is my understanding that
19 you received and used the electronic copies of them
20 as well as several colored hard copies. See
21 invoice #LVL-1024 in the amount \$8,000. We require
22 payment in full for that invoice."